

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, <i>et al.</i> , <sup>1</sup>	§	Case No. 20-33948 (MI)
	§	
	§	
Debtors.	§	(Jointly Administered)
	§	

**JOINDER OF RIDGEWOOD KATMAI, LLC AND ILX PROSPECT KATMAI, LLC TO  
ECOPETROL’S STATEMENT IN SUPPORT OF THE DEBTORS’  
EMERGENCY REQUEST TO EXTEND THE AUTOMATIC STAY**

Related Docket Nos. 563 and 572

1. Ridgewood Katmai, LLC (“Ridgewood”) and ILX Prospect Katmai, LLC (“ILX Prospect” and together with Ridgewood, the “Non-Op WIOs” ) by and through their undersigned counsel, hereby support the application of the automatic stay and join in *Ecopetrol America LLC’s Statement in Support of the Debtors’ Emergency Request to Extend the Automatic Stay* [Docket No. 572]. The Non-Op WIOs respectfully incorporate the arguments set forth therein as if set forth herein and as applied to the Unit Operating Agreement by and between Fieldwood, Ridgewood, and ILX Prospect dated April 1, 2018. *See* Atlantic Exhibit 5, at Docket No. 570-5.

2. As acknowledged by the Debtors, the Non-Op WIOs have paid all joint-interest-billings in full to the Debtors, as operator, including their share of any amounts alleged to be owed by the Debtors to Atlantic Maritime Services LLC’s (“Atlantic”). Atlantic’s recently filed *ex parte* motion against the Non-Op WIOs seeks to have the Non-Op WIOs pay at least the *same amounts*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

*yet again* as a result of the Debtors' withholding of certain payments to Atlantic. Essentially, Atlantic is suing the Debtors' Non-Op WIOs for a double-dip rather than pursuing its claim in this Court against the Debtors, as operator, and as the only party in privity with Atlantic. Given the Non-Op WIOs' expenses, damages, and rights of indemnification against the Debtors, as well as the inequitable end-run by Atlantic to prosecute its claim against the appropriate party – the operator – in this Court, the extension of the automatic stay is appropriate.

WHEREFORE, the WIOs respectfully request that the Court grant Debtors' Motion and grant any other relief that the Court deems just and proper.

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Respectfully submitted on this 23rd day of November 2020.

*/s/ Michael Fishel*

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**SIDLEY AUSTIN LLP**

Duston K. McFaul (TX Bar No. 24003309)

Michael Fishel (TX Bar No. 24082998)

1000 Louisiana St., Suite 5900

Houston, TX 77002

Telephone: (713) 495-4500

Facsimile: (713) 495-7799

Email: [dmcfaul@sidley.com](mailto:dmcfaul@sidley.com)

[mfishel@sidley.com](mailto:mfishel@sidley.com)

*Attorneys for Ridgewood Katmai, LLC and ILX*

*Prospect Katmai, LLC*

**CERTIFICATE OF SERVICE**

I certify that on November 23, 2020, a copy of this document was served by electronic service on all counsel of record via the Court's CM/ECF system.

*/s/ Michael Fishel*

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*Michael Fishel*